

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
White Plains, NY 10605
914-385-0292

In Re:

Case No.: 17-18123-KF

Nelson Sanchez,

Debtor,

Hearing Date: October 24, 2017

Chapter: 7

Judge: Kathryn C. Ferguson

Opposition to Specialized Loan Servicing, LLC Motion for
Relief from Automatic Stay

The debtor, Nelson Sanchez, ("Debtor"), respectfully objects to the Motion for Relief from Stay filed by Denise Carlon, Esq. on behalf of Specialized Loan Servicing, LLC holder of a mortgage ("Creditor"). In support thereof, counsel submits the following:

1. On April 21, 2017 Debtors filed a Voluntary Chapter 7 petition.
2. On September 18, 2017 Creditor filed its motion for Relief from Automatic Stay.
3. The Debtor lives and has an ownership interest in certain real property located at 498 Broad Avenue, Englewood, NJ 07631 (the "Property").

4. Upon information and belief the Debtor is actively pursuing loss mitigation on his own.

WHEREFORE, for the foregoing reason, the Debtor respectfully requests that this Honorable Court Deny the Motion for Relief from Stay and grant the Debtor such other and further relief as this Court deems appropriate.

Dated: Union City, NJ
October 17, 2017

/s/ Paola D. Vera, Esq.
By: Paola D. Vera, Esq.
CABANILLAS & ASSOCIATES, PC
Attorneys for the Debtor
4100 Kennedy Blvd., Suite 102
Union City, NJ 07087